

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: SLABBED NEW MEDIA, LLC
Debtor

CHAPTER 11
CASE NO. 15-50963-KMS

**SECOND MOTION TO EXTEND DEBTOR'S
TIME TO REMOVE CAUSES OF ACTION**

COMES NOW Slabbed New Media, LLC (the "Debtor"), and files this its *Second Motion to Extend Debtor's Time to Remove Causes of Action* (the "Motion"), and in support thereof, would show unto the Court the following, to-wit:

1. On June 16, 2015, the Debtor herein filed with this Court its Voluntary Petition for reorganization under Chapter 11 of the Bankruptcy Code.

2. In conjunction with this Chapter 11 case, the Debtor is aware that certain pre-petition claims may exist (and possibly post-petition claims as well), either directly or indirectly against the Debtor, that may need to be removed pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure.

3. In order to fully protect the Debtor's rights regarding all pre-petition causes of action and/or claims (pending as of the filing of this Motion), and/or all post-petition claims, the Debtor respectfully seeks herein to extend the time for removing pre and post-petition causes of action pursuant to Rule 9027 an additional ninety sixty (60) days from November 15, 2015, up to and including January 14, 2016, so that Debtor can obtain local counsel with Court approval to remove out of state cases.

4. The Motion is in the best interest of all creditors and parties-in-interest and the extension sought herein is not sought for the purposes of unreasonable delay.

5. The Debtor submits that, in light of the relief requested, a Preliminary Order should be entered in the event objections are filed prior to the time a final hearing may be held on this matter.

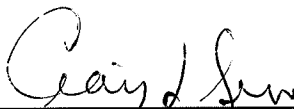
This, the 11th day of November, 2015.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

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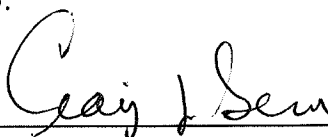
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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq.
Office of the United States Trustee
christopher.steiskel@usdoj.gov

This, the 11th day of November, 2015.


Craig M. Geno